ROBERT M. DRASKOVICH, ESQ. 1 Nevada Bar No. 6275 815 South Casino Center Blvd. Las Vegas, Nevada 89101-6718 702-474-4222 3 Attorney for Defendant emagana@draskovich.com 4 robert@draskovich.com 5 UNITED STATES DISTRICT COURT 6 **DISTRICT OF NEVADA** 7 UNITED STATES OF AMERICA, Case No.: 2:16-CR-00200-JCM-PAL Plaintiff, 8 STIPULATION TO CONTINUE 9 SENTENCING HEARING vs. (Fourth Request) 10 11 ASHLEY ZAMBUTO, Defendant. 12 13 Defendant, Ashley Zambuto, by and through her attorney of record, Robert M. 14 Draskovich, Esq., and Plaintiff United States of America, by and through DAYLE ELIESON, 15 United States Attorney, and Daniel Cowhig, Assistant United States Attorney, stipulate and 16 request that the Court continue her sentencing hearing, currently scheduled for May 7, 2018, 17 until September of 2018 or to a date convenient for the Court. The government's investigation 18 into related criminal activity by others is ongoing. The instant case is related to <u>USA v Boyar</u>, 19 et al. A trial date is currently set in June of 2018. 20 Accordingly, in the view of the government and the defendant, this case is not ripe for 21 sentencing. Defendant Zambuto is not in custody, and specifically requests this continuance. 22 Defendant Zambuto is in compliance with her release conditions. Defendant Zambuto waives 23 any right she may have to a speedy sentencing in this matter.

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WHEREFORE, the parties stipulate and request that the Court continue defendant Zambuto's sentencing hearing, currently scheduled for May 7, 2018, until September of 2018 or to a date convenient for the Court. RESPECTFULLY SUBMITTED this 27<sup>th</sup> day of March, 2018. /s/ Daniel Cowhig DANIEL COWHIG Assistant United States Attorney By: /s/ Robert M. Draskovich, Esq. ROBERT M. DRASKOVICH, Esq. Counsel for defendant Zambuto 

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	) Case No.: 2:16-CR-00200-JCM-PAL
Plaintiff,	) ORDER CONTINUING SENTENCING
vs.	) HEARING
ASHLEY ZAMBUTO,	)
Defendant.	)
	<u> </u>

This matter comes before the Court on the parties Stipulation to Continue Sentencing.

Based on the stipulation of the parties, and good cause appearing therefore, the Court hereby finds that:

- 1. The government's investigation into related criminal activity by others is ongoing. The instant case is related to <u>USA v Boyar</u>, et al. A trial date is currently set in June of 2018. Accordingly, in the view of the government and the defendant, this case is not ripe for sentencing. Defendant Zambuto is not in custody and has no objection to a continuance of her sentencing hearing, currently scheduled for May 7, 2018, until September of 2018 or to a date convenient for the Court.
- 2. The Court hereby concludes that the ends of justice are best served by granting this continuance of defendant Zambuto's sentencing.

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**ORDER** IT THEREFORE ORDERED that the sentencing hearing, currently scheduled for May 7, 2018 is vacated and reset for Monday, September 24, 2018 at 10:00 a.m. IT IS SO ORDERED March 29, 2018. UNITED STATES DISTRICT JUDGE Respectfully Submitted by: /s/ Robert M. Draskovich ROBERT M. DRASKOVICH, ESQ. Nevada Bar No. 6275 Attorney for Defendant Zambuto